



Momentive Performance Materials Inc.
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Friendly, WV 26146
momentive.com

July 27, 2017

Mr. Kenan Cetin
WVDEP – Division Land Restoration
Office of Environmental Remediation
601 57th Street SE, Room 1077
Charleston, WV 25304

Re: 2017 Second Quarter Corrective Action Update
MPM Silicones, LLC – Sistersville Plant
EPA ID No. WVD004325353

Dear Mr. Cetin:

This letter report is MPM Silicones, LLC's quarterly corrective action update for the reporting period of April 1, 2017 through June 30, 2017 as specified in the above referenced hazardous waste management renewal permit, module X, section H-1 which became effective May 30, 2008. Beginning July 1, 2011 we are providing Corrective Action Updates quarterly rather than bi-monthly in accordance with the Class 2 modification of our RCRA permit approved by WVDEP on May 19, 2011.

1. Introduction:

The Permit requires the following corrective actions at the Facility:

Permit Reference	Corrective Action Area	Corrective Action Requirements
G-3b	North Inactive Site	Earthen cover inspection & maintenance Annual groundwater monitoring
G-3c	South Inactive Site	Ground cover inspection Quarterly groundwater monitoring
G-3d	Waste Water Treatment System	Equipment inspection Surface impoundment leak rate monitoring
G-3e	Sludge Pond and BTEX Area	Groundwater recovery well operation Quarterly groundwater monitoring

2. Work Completed During the Reporting Period:

Activities during the Reporting Period relating to these corrective actions are described below.

G-3b North Inactive Site – The earthen cover, diversion ditches and the banks of Sugar Camp Run were inspected on June 17.

G-3c South Inactive Site – Quarterly groundwater sampling and inspection of the ground cover were completed the week of June 4. Analytical results will be reported in the annual corrective action report as specified in Section H-2 of Module X.

G-3d Waste Water Treatment System – The permit requires reporting and additional actions if the monthly average leakage rate exceeds 750 gallons per day for the collection sumps of either surface impoundment (reviewed weekly). Both sumps averaged less than 113 gallons per day during this period.

The West primary clarifier was shut down in March for repairs to the bridge. The East primary clarifier was shut down in March and April for maintenance and repair. Both were inspected at these times.

Sludge was removed from the Panic Pond, dewatered, and a total of 216,540 pounds disposed of in the on-site hazardous waste landfill in April and May during annual cleaning of the surface impoundments. The EQ basin was also inspected and it was determined that no sludge removal was necessary due to lack of accumulation.

G-3e No.3 Sludge Pond and BTEX Area – Quarterly groundwater sampling was completed the week of June 5. Analytical results will be reported in the annual corrective action report as specified in Section H-2 of Module X.

3. Summary of findings:

G-3b, G-3c & G-3e – No findings this period.

G-3d Waste Water Treatment System – Both of our surface impoundment collection sumps averaged less than 113 gallons per day (on a monthly basis) during the reporting period.

4. Changes made during the reporting period:

G-3b, G-3c, G-3d and G-3e – No changes were made during the reporting period.

5. Problems encountered and actions taken to rectify problems:

G-3b, G-3c and G-3d – No problems were encountered during the reporting period.

6. Changes in Facility Personnel:

G-3b, G-3c, G-3d and G-3e – No changes were made in personnel during the reporting period.

7. Projected Work During the Next Reporting Period:

G-3b North Inactive Site – Work next period (July-September) will include scheduled inspections of the earthen cover, diversion ditches and the banks of Sugar Camp Run and annual groundwater monitoring scheduled for the week of August 28.

G-3c South Inactive Site – Work next period (July-September) will include scheduled inspection of ground cover and quarterly groundwater monitoring scheduled for the week of August 28.

G-3d Waste Water Treatment System – Work next period (July-September) will include continued weekly evaluation of monthly average leakage rates for the surface impoundments. The East UNOX reactor will be shut down and inspected in October.

G-3e No.3 Sludge Pond and BTEX Area – Work next period (July-September) will include continued operation of the groundwater recovery well and quarterly groundwater monitoring scheduled for the week of August 28.

As required by Condition I-I of our permit, the following certification is being made:

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

If you have any questions concerning this report, please contact Vic Cwynar at (304) 652-8612 or by email at victor.cwynarjr@momentive.com.

Sincerely,
MPM SILICONES, LLC



Chad McKnight
Sr. Director of Operations

cc: John Garner - MPM
Steve Freed - MPM
Sanat Bhavsar - MPM
Paul Z. Meyer- Chemtura
Talal Fathallah - WVDEP
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